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March 20, 2008

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Honorable Charles L. Briant
United States District Judge
Southern District of New York
United States Courthouse, Room 275
300 Quarropas Street
White Plains, New York 10601-4150

*Application Granted
Conference of 3/28/08 is
Adjourned to 7-11-08 @ 9:00 -
This date will not be adjourned
to be ordered
3/24/08 Charles L. Briant
USDC*

Re: Encompass Insurance Co. a/s/o Juan Polanco and Martina Fernandez
v. DeLima Contractors, Inc., et. al.
Civil Action No.: 07 CV 3857
Our File No.: 167575

Dear Judge Briant:

As Your Honor is aware, our firm represents Encompass Insurance Company, the plaintiff in the above-referenced matter. I am writing with the consent of all counsel to respectfully request an extension of time to complete discovery in this case and to seek an adjournment of the Case Management Conference presently scheduled for Friday, March 28, 2008.

As Your Honor is aware, an Initial Conference was held on October 25, 2007. At that time, defendant DeLima had yet to serve an Answer or otherwise appear in the action. Although all parties have appeared at this time, defendant DeLima did not appear until mid-December.

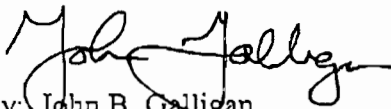
Presently, the parties are in the process of scheduling party depositions. As such, we respectfully request an extension of the discovery deadline until Friday, June 20, 2008. We also request that the Court reschedule next week's Case Management Conference for a date after June 20, 2008. Please note that this is the first request for an adjournment made by any party in this action.

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Your Honor's time and consideration are greatly appreciated in the matter.

Very truly yours,

COZEN O'CONNOR


By: John B. Galligan

JBG/kw

cc: (VIA FACSIMILE)

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